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November 15, 2007

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
EXPANDED ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Red Line/Blue Line Connector  
PROJECT MUNICIPALITY : Boston  
PROJECT WATERSHED : Boston Harbor  
EEA NUMBER : 14101  
PROJECT PROPONENT : Executive Office of Transportation  
DATE NOTICED IN MONITOR : September 25, 2007

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of a mandatory Environmental Impact Report (EIR).

Project Description

As described in the Expanded Environmental Notification Form (EENF), the project consists of the extension of the Massachusetts Bay Transportation Authority's (MBTA) Blue Line under Cambridge Street to Charles/MGH Station. The project begins at the Government Center Station Blue Line platform and extends to the connection with the new Charles/MGH Station headhouse. The project consists of at least three major components: 1) the realignment of the westbound Blue Line track through Bowdoin Station including the widening of the existing tunnel and the closure of the existing Bowdoin Station, 2) a new 1,400 foot rapid transit tunnel extending the Blue Line under Cambridge Street, from Joy Street to Charles Circles, and 3) a new underground Blue Line Station connected to the existing Charles/MGH Station headhouse. The project may also include the construction of a new Bowdoin Station accompanied by

additional modifications to existing tunnels. The entire project, with the exception of parts of Bowdoin Station, lies within the right-of-way of Cambridge Street.

As described in the EENF, the project is an initiative of the Executive Office of Transportation (EOT) in coordination with the MBTA to implement enhancements to transit services that will improve mobility and regional access for the residents of East Boston and North Shore communities and the residents of Cambridge and the northwestern suburbs. This project is expected to boost transit ridership, reduce automobile travel through downtown, improve air quality, and reduce congestion in the existing downtown transfer stations.

Design of the project is included in the latest revision of the State Implementation Plan (SIP). The SIP contains procedures and programs to monitor, control, maintain, and enforce compliance with all national air quality standards per the Clean Air Act. The Red Line/Blue Line Connector is a specific project outlined in the SIP; a project proposed in association with mitigation commitments from the Central Artery/Tunnel (CA/T) project. According to the EENF, MassDEP has promulgated a new set of transit regulations (310 CMR 7.36) and submitted them to the United States Environmental Protection Agency (U.S. EPA) as a SIP revision. These revisions include a commitment to complete the final design of the project by the end of 2011. The SIP revisions are presently under review by the U.S. EPA.

The majority of comment letters I received were generally supportive of the project's goal of enhancing access to public transportation and alleviating vehicle trips within the downtown Boston core. This project is seen by many as vital to the enhancement of the transit system and important to serving major employment centers via rapid transit service. While the merits of the project appear to have received positive support, comments were received that focused on construction period impacts, ongoing noise and vibration, and maintaining groundwater levels. Another concern echoed by several commenters is the integration of this project into the larger scheme of major transportation infrastructure improvements slated for the Beacon Hill/West End/Back Bay region. I am confident that EOT and the MBTA can and will address these issues responsibly and thoroughly. The key to the project's overall success will be proactive coordination with State agencies, the City of Boston, neighborhoods and abutters to ensure that it balances appropriately the adequacy of transit access with mitigation.

### Jurisdiction and Permitting

The project is undergoing review pursuant to Section 11.03(6)(a)(5) because the project is being undertaken by a State Agency and will result in the construction of a new rail or rapid transit line along a new, unused or abandoned right-of-way for transportation of passengers or freight. The project will require an access permit from the Department of Conservation and Recreation (DCR) for work affecting Charles Circle. The project will also require a National Pollution Discharge Elimination System General Permit from the United States Environmental Protection Agency (U.S. EPA). The MBTA will own and operate the project; the MBTA is generally exempt from the requirements of municipal permitting programs.

The project is being undertaken by a State Agency (EOT). Furthermore, the project may be financed by funds issued by the Commonwealth. Therefore, MEPA jurisdiction for this project is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment.

### Single EIR/Waiver Request

In accordance with Section 11.05 (7) of the MEPA regulations, the proponent has submitted an EENF with a request that I allow the proponent to fulfill its EIR obligations under MEPA with a Single EIR, rather than the usual process of a Draft and Final EIR. The EENF received an extended comment period pursuant to Section 11.06 (8) of the MEPA regulations, and the MBTA extended the comment period until November 8, 2007 to provide opportunities for further review and input due to a delayed mailing of the EENF to interested parties. Section 11.06(8) of the MEPA regulations indicate that a Single EIR may be allowed provided that the EENF:

- (a) describes and analyzes all aspects of the Project and all feasible alternatives, regardless of any jurisdictional or other limitation that may apply to the Scope;
- (b) provides a detailed baseline in relation to which potential environmental impacts and mitigation measures can be assessed; and
- (c) demonstrates that the planning and design for the Project use all feasible means to avoid potential environmental impacts.

I have reviewed the proponent's request for a Single EIR in accordance with the MEPA regulations. Several interested parties noted that they were not against the granting of a Single EIR, as the overall merit of the project and need for project advancement is a goal of regional transportation planning efforts. However, while the EENF provides a description of the project and project elements and notes the statutory definition of project alignments, it does not provide current baseline data from which to measure potential environmental impacts, quantify potential impacts or demonstrate how such impacts will be mitigated. The EENF does not include a baseline analysis of noise, vibration, traffic, air quality impacts or stormwater. This lack of supporting data in accordance with the MEPA regulations (as outlined above) makes it difficult at this juncture to confirm that EOT has demonstrated that all feasible means to avoid potential environmental impacts have been presented. Therefore, the proponent must prepare both a Draft and Final Environmental Impact Report in accordance with 301 CMR 11.07.

This Certificate lays out a Scope for the Draft EIR (DEIR) that requests more information about certain aspects of the project. I would like to acknowledge the importance of this project to the overall metropolitan transportation system and the statutory obligation to design and/or complete (depending upon the outcome of SIP revisions) the project by 2011. Therefore, should the DEIR resolve the substantive issues outlined below, I will consider the procedural options available to me at 301 CMR 11.08 (8)(b)(2), as they may relate to the Scope for the Final EIR.

## SCOPE

### General

The EIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this scope. The DEIR should include a copy of this Certificate.

### Project Description and Permitting

The DEIR should provide a detailed project description including a project phasing schedule, project costs, and funding sources. The DEIR should describe the history of rapid transit use in the corridor, consistency of the project with the State Implementation Plan (SIP), and the correlation of the proposed improvements with other MBTA projects, notably the renovations of Government Center Station and Blue Line railway car upgrades.

The DEIR must include a detailed existing conditions plan and supporting narrative that provides a reasonable context of the project to abutting land uses, existing MBTA stations and tracks/tunnels, historical structures, major utilities, and potentially contaminated sites. Existing conditions plans should depict both above ground and below ground conditions along the project corridor.

The DEIR must also include proposed conditions plan illustrating proposed elevations (horizontal and vertical/above ground and below ground), track locations, location of stormwater or groundwater management systems, ventilation buildings and emergency exits, landscaping and streetscape improvements, or other project components. It should provide detailed information on station locations, designs, lighting and access. The DEIR should also include a circulation plan illustrating how motor vehicles, buses, pedestrians and cyclists will access each station. As the Charles/MGH Station would become a new terminus for the Blue Line, detail on the location of storage tracks and train storage should be provided in the DEIR. It should describe electrical systems including the substations and signal and communication systems. The DEIR should identify temporary and permanent land takings. The DEIR should include plans, designs, renderings and, where appropriate, illustrations or photos. Plans should be provided at a reasonable scale to allow for the comparison of relevant environmental impacts.

The DEIR should include a list of required permits and approvals, demonstrate the project's consistency with regulatory standards and provide an update on the status of each permit and/or approval.

Alternatives

The project area has a history of use by streetcars and rapid transit cars. Upon termination between 1924 and 1952 of various types of services to Cambridge from the Government Center/Bowdoin Station area, the tunnel between Bowdoin Station and Joy Street was filled and sealed leaving a dead end track extending off the existing loop track at Bowdoin Station. The proposed connector, originally called the Bowdoin-Charles Connector, was the subject of a feasibility study in 1986 and subsequent Preliminary Design and Environmental Study. This study was halted in 1987 and a status report was generated summarizing the work completed at that time. These studies examined the extension of the Blue Line from the end of the existing tail track tunnel, near Joy Street, under Cambridge Street to Charles/MGH Station, where a new underground platform would be built with pedestrian connections to the elevated Red Line platforms.

Since the completion of preliminary studies in the mid-1980s, several improvements and new projects have come online that likely will influence the final design alternative. These projects include the renovation of the Charles/MGH headhouse, proposed renovations to the Government Center Station that may include a new entrance closer to the JFK Building, and the potential closure of Bowdoin Station. The introduction of new 6-car trains on the Blue Line will require either the closure of Bowdoin Station in its current configuration or construction of a new Bowdoin Station along realigned tracks. Due to safety concerns, the tight turning radius of the existing loop track at Bowdoin Station will need to be eliminated through re-alignment of the westbound track if this track is to be extended as part of the Red Line/Blue Line Connector. The EENF notes that given the changes in the project vicinity and the overall transit system since 1987, the current project consists of a slightly larger project area and will be more complex and costly than previously studied or anticipated.

Given that the project does not propose any new station locations (Bowdoin Station may or may not be rebuilt in the same general location) and that the only viable option is a rapid transit mode, alternatives for the project are narrowly focused. Based on the legal commitment requiring construction of this specific connection between the Red Line and the Blue Line and general support for the alignment and proposed technology, the DEIR should include analysis of the following alternatives:

- No Build (i.e. no action)
- Blue Line Extension to Charles/MGH Station with Elimination of Bowdoin Station; and
- Blue Line Extension to Charles/MGH Station with Relocated Bowdoin Station

Several commenters suggested alternative layouts and configurations in track width or train storage locations, or the possibility of a pedestrian tunnel that may reduce overall project impacts. EOT should provide a response to these suggested layouts and configurations as part of the DEIR. The DEIR should confirm if these options are consistent with the pending SIP and transit regulations, and if so, provide additional detail on the potential environmental, operational and cost impacts of implementing such alternatives.

The purpose of the alternatives analysis is to explore alternatives that will meet ridership goals and other project objectives while reducing potential impacts. The alternatives analysis should consider the potential environmental benefits that may be gained through use of fewer tracks (i.e. two versus four) or other configurations within the Cambridge Street right-of-way and evaluate the advantages or disadvantages of such configurations. I am cognizant of the fiscal constraints within which this project is being planned and realize that all investment should be carefully analyzed to determine its benefits. The DEIR should describe benefits and drawbacks based on information on construction period impacts, noise, vibration, air quality and historical resources impacts, and opportunities to minimize stormwater runoff and groundwater impacts. Information on baseline conditions – noise, vibration, air quality, traffic, groundwater, historical resources, access - will be critical for adequately comparing alternatives.

Critical to this evaluation of alternatives is the construction methodology. The EENF indicated a preference for a cut and cover construction technique. However, given the dense nature of the project area, the highly traveled right of way, and the recent completion of millions of dollars worth of landscape and streetscape improvements to Cambridge Street, the DEIR should investigate an alternative construction method that limits above ground impacts along the project corridor. The DEIR should describe possible construction techniques and provide time, cost and environmental impact data for each construction technique analyzed. The DEIR should demonstrate that the preferred technique is consistent with MEPA regulations to avoid, minimize and mitigate damage to the environment.

In conjunction with the alternatives analysis, the proponent should discuss the impact of a decommissioned Bowdoin Station. The DEIR should address what would happen to the existing headhouse on Cambridge Street and the station itself if this station is eliminated from the transportation system.

#### Transit Ridership

The air quality benefits of this light rail connection will vary depending on the ridership levels that can be generated by the project design and operating plan. The DEIR should propose a design and operating plan that generates the highest level of ridership possible while balancing the use of MBTA resources and community impacts. The DEIR should include updated transit ridership data that incorporates anticipated growth in the area and changes in trip distribution based upon this new transit option. Increased ridership and an associated reduction in vehicle miles of travel (VMT) should be re-evaluated for all alternatives explored in the DEIR. The DEIR should describe the assumptions used to generate the ridership numbers (including the margin of error associated with the model) and the operating parameters necessary to achieve them such as number and type of vehicles, vehicle capacity, travel time and peak and off peak headways. The DEIR should specify whether VMT reductions are based on new or diverted trips. To the extent feasible, transit ridership numbers should consider future transit system expansion beyond the project itself.

The DEIR should address how construction of the project will impact existing service (including access to and within the stations) at Charles/MGH Station, Bowdoin Station, or

Government Center Station, including whether shutdowns or reduction in service will be required. Furthermore, the DEIR should discuss if any existing alternative transportation modes (i.e. buses, private shuttle bus routes for MGH) will be negatively impacted during the construction period.

### Traffic and Transportation

The EENF states that the project will result in a net reduction of vehicle trips in comparison with a No Build Alternative. Additionally, the primary mode of access to the new Blue Line Station at Charles/MGH would be by walking or by transfer from the Red Line inside the expanded Charles/MGH Station. No dedicated parking is anticipated in conjunction with this project due to its urban location.

The DEIR should include a detailed traffic study with data for existing and proposed conditions along with an analysis of impact on vehicle trips within the project area for each project alternative. The overall purpose of the traffic analysis is to demonstrate that the anticipated reduction in vehicle trips along the project corridor are reasonably achievable. The DEIR should analyze traffic for existing, build and no build conditions to evaluate the implications of the project for intersection Level of Service (LOS) and pedestrian and bicycle circulation. It should address traffic circulation on roadways adjacent to the proposed project area. The DEIR should clearly state assumptions incorporated into the modeling process and consider background growth and new development projects within the model. It should include mitigation for areas where the project will have a significant impact on traffic, pedestrian or bicycle operations. EOT should work with DCR, MassHighway and the City of Boston to determine the scope of study area commensurate with anticipated project impact. Jurisdictional areas of studied intersections and roadway segments should be clarified in the DEIR.

The DEIR should provide a summary of the integration of the project into the overall transit system and the anticipated benefits (or drawbacks) of constructing the project. The DEIR should discuss how adding additional length to the Blue Line system may affect headways, operating costs and system efficiencies. The DEIR should demonstrate project consistency with various regional and State transportation policies.

### Air Quality

According to the U.S. Environmental Protection Agency (EPA) Massachusetts is in moderate non-attainment for ozone, whose precursors are nitrogen oxides (NOx) and volatile organic compounds (VOCs). Ozone pollution causes a variety of health problems including aggravated asthma, reduced lung capacity and increased susceptibility to respiratory illnesses like pneumonia and bronchitis. A study by the Centers for Disease Control and Prevention revealed that Massachusetts has the highest rates of asthma for adults in the nation. Cars, trucks and buses, are the largest source of criteria air pollutants, air toxics and greenhouse gases in the state. The Red Line/Blue Line Connector has the potential to reduce local air quality impacts by maximizing public transit service and replacing some vehicle trips with rapid transit.

The DEIR should describe the air quality benefits associated with this project and describe its consistency with the State Implementation Plan (SIP) and MassDEP's Transit Regulations. The DEIR should clarify if air quality permits are required from State or Federal agencies in association with the construction or operation of the project. The DEIR should include modeling data and assumptions to support claims in the EENF that the project will result in a reduction in emissions for Carbon Monoxide (CO), Oxides of Nitrogen (NOx), and Volatile Organic Compounds (VOC emissions). Additionally, the proponent should address potential air quality impacts during the construction phase and propose sufficient mitigation to offset increases in localized construction period air quality. The DEIR should include a mesoscale and a microscale air quality analysis. The analyses should analyze the following emissions: VOC, NOx, greenhouse gases, CO, particulate matter (PM) and air toxics. These analyses should demonstrate that the project will result in measurable local and regional air quality improvements and total emission reductions. EOT and the MBTA should consult with MassDEP regarding the development of the study protocols before initiating the study and submitting the DEIR.

### Noise/Vibration

The DEIR should include an analysis of noise and vibration for existing and proposed conditions. These analyses should identify sensitive receptors such as homes, hospitals, schools and elderly housing where noise is a particular concern. The DEIR shall include a detailed noise assessment and vibration analysis for the corridor that is consistent with Federal Transit Administration (FTA) guidelines, and an assessment of the impact of service on the surrounding community. The EENF stated that a monitoring program to measure structure settlements and ground movements and strains that translate into vertical and horizontal movement of the ground adjacent to the excavation should be implemented to control and minimize potential impacts to all structures and properties within the anticipated vibration envelope. The DEIR should outline such a monitoring program and indicate areas where mitigation for noise and vibration is needed based on the impact assessment and identify the specific mitigation that will be proposed (e.g. use of sound insulation, sound barriers, maintenance plans). The DEIR should specifically address within these analyses the unique conditions that will be experienced during the construction period and outline construction related noise and vibration mitigation measures.

### Land

The project site is approximately seven acres in area and consists of the right-of-way corridor along Cambridge Street between the Government Center Station and the Charles/MGH Station. The project area was recently subjected to significant upgrades, with improved pedestrian signals, landscaping and streetscape improvements and a reconfiguration of the Charles Circle traffic pattern.

The DEIR should clarify jurisdictional areas with regard to right-of-way ownership and specifically identify those areas of the project area that may be controlled by the Department of Conservation and Recreation (DCR) or subject to EOEEA's Article 97 policy. The DEIR should

address how the project will be completed in accordance with applicable DCR construction requirements for work affecting DCR roadways.

The project will require the excavation and removal of substantial amount of earth to accommodate the new tunnel system. The DEIR should conceptually quantify the volume of earth to be excavated and removed, and discuss how soil will be excavated and removed from the project area. Stockpile areas awaiting transport should be identified to ensure that they can be accommodated within the project area. The DEIR should include a geotechnical analysis that characterizes soil types and provides supporting geotechnical data for both existing and proposed conditions. The DEIR should confirm that proposed construction methodologies are suitable for use in the soil types found along the project corridor.

The EENF indicates that a realignment of tracks near Bowdoin Station and construction of a new Bowdoin Station may impact a park at the intersection of Cambridge Street and New Chardon Street. The DEIR should clarify ownership of this park, confirm that it is not (or is) Article 97 land, and what direct impact to this park may occur as a result of various project alternatives. The DEIR should identify if public shade trees may be lost and outline mitigation measures offset impacts upon completion of construction.

#### Groundwater

Several comments have raised concerns about the potential impact tunneling may have on existing groundwater conditions within the project area. The City of Boston has been actively addressing the issues surrounding displacement and lowering of groundwater levels within the City and the potential impact to structural integrity and other environmental impacts. The DEIR should include data that depicts the existing levels of groundwater in the project area and the anticipated groundwater levels upon the completion of construction. The DEIR should address how groundwater impacts will be avoided, minimized or mitigated in association with the project. Opportunities to maintain or increase groundwater levels beyond existing conditions should be investigated in the DEIR. Consideration should be given to the impact of groundwater level changes on adjacent historic structures and the overall structural integrity of existing infrastructure. Finally, the DEIR should outline a groundwater monitoring plan to ensure the effectiveness of proposed mitigation measures.

#### Open Space and Historic Resources

The project corridor includes several historic resources and properties located in the Massachusetts Historical Commission (MHC) Inventory of Historic and Archaeological Assets and open space resources including playgrounds and regional parkland. Two sites located immediately adjacent to the project on Cambridge Street are listed on the State Register of Historic Places and the National Register of Historic Places. These sites include the Old West Church/West End Church and the Harrison Gray Otis House. There are also six additional historic sites listed in the State Register within one block of the project corridor. No direct alterations to any of these structures is anticipated.

EOT must consult with the Massachusetts Historical Commission (MHC) to evaluate impacts and develop appropriate mitigation. The outcome of this MHC consultation should be included in the DEIR. The DEIR should provide a Historic and Cultural Resource map and resource summary to identify historic resources and open spaces adjacent to the corridor and/or likely to be impacted by air quality, noise, vibration and stormwater impacts associated with the project. This map should confirm the location of State and local historic districts as well as individual properties. The DEIR should include detailed descriptions of registered properties immediately adjacent to the project corridor, including the Harrison Gray Otis House and the Old West Church. It should describe measures that will be employed to avoid, minimize and mitigate impacts to these resources. The DEIR should include a commitment to the provision of field survey, research, analysis, and documentation services in order to comply with the appropriate federal and state regulations concerning the protection of historic and/or archaeological resources, including, but not limited to, the National Historic Preservation Act of 1966.

#### Stormwater

The project has the potential to alter existing stormwater drainage patterns in the project vicinity. The DEIR should include a proposed stormwater management plan, which should be prepared in compliance with the MassDEP Stormwater Management Policy (SMP) and the NPDES General Permit. The DEIR should evaluate drainage in the new tunnel during the construction period. Supplemental graphics and data should be included in the DEIR that, at a minimum, depicts the existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control or treatment structures to be utilized during the construction period. The DEIR should address the comments made by the Boston Water and Sewer Commission (BWSC) with regard to retaining stormwater and dewatering drainage on-site or directing discharges to the Charles River prior to considering discharge to the BWSC system. Confirmation that stormwater will not be discharged to sanitary sewer should be provided. Finally, the DEIR should analyze the impact of stormwater discharges to the Charles River, if applicable.

The proponent is reminded that, according to the MassDEP comment letter, revisions to the SMP, and incorporation of the policy into the wetlands and 401 Water Quality Certification regulations, will take effect on January 2, 2008. The DEIR should demonstrate that source controls, pollution prevention measures, erosion and sediment controls during construction, and the post-development drainage system are consistent with the SMP for water quality and quantity impacts and the NPDES General Permit.

#### Hazardous Waste/Contaminated Soils

The EENF indicates that there are no confirmed active Chapter 21E sites within the proposed project route. However, there are a number of regulated sites less than a mile from the project corridor, four of which are immediately adjacent to project area. The EENF indicates

that new reviews and potential remediation of 21E sites will be needed as the project design progresses. Removal of contaminated soil, pumping contaminated groundwater or working in contaminated media must be done consistent with the provisions of MGL c.21E/21C and OSHA.

The DEIR should describe how contaminated soil will be evaluated, managed and disposed. The list of hazardous waste sites should be updated consistent with MassDEP comments and its database and Release Tracking Numbers (RTN) should be added to the list. A brief summary of the contaminated sites immediately adjacent to the project site characterizing the nature of the contamination, status of clean up, and the potential relationship of existing environmental conditions to project construction impacts should be included in the DEIR. EOT should consult with MassDEP regarding the planning and implementation of any possible demolition and the management of contaminated soil to ensure consistency with applicable regulations.

#### Water/Wastewater

The DEIR should identify any water or wastewater flows required in conjunction with the construction or operation of the project. The DEIR should identify any new sanitary facilities that may be constructed under each project alternative and estimate new water or wastewater demand.

#### Construction Period Impacts

The DEIR should include a discussion of construction phasing, evaluate potential impacts associated with construction activities and propose feasible measures to avoid or eliminate these impacts. The DEIR should identify temporary and permanent construction easements. The proponent must comply with MassDEP's Solid Waste and Air Quality Control regulations during construction. The proponent should implement measures to alleviate dust, noise, and odor nuisance conditions (including rodent control), which may occur during construction.

The DEIR must include a construction staging plan with the goal of maintaining four lanes of traffic on Cambridge Street during construction, maintaining pedestrian access to businesses and public transportation, and limiting the temporary removal of parking and loading zones to the maximum extent feasible. The project area is well traveled by ambulances due to its proximity to several hospitals, as well as the presence of a Boston Fire Department Station. It is critical that the construction period traffic management plan specifically focus on maintaining full and efficient access along the project corridor for emergency vehicles. Mitigation measures should be developed to ensure consistent access along Cambridge Street for ambulances and emergency vehicles. Furthermore, a traffic management plan should address how it will discourage cut through traffic along residential streets within Beacon Hill and the West End.

The MBTA has developed a construction equipment retrofit program to reduce exposure to diesel exhaust fumes and particulate emissions for its construction projects. The MBTA must

require contractors to retrofit construction equipment while working in this dense, urban corridor.

The DEIR should include a current inventory of all affected utilities within the project area, identify the owners of each affected component, and outline a plan to maintain continuous service during construction, or replacement of infrastructure if necessary. The DEIR should discuss which major utilities will require temporary or permanent relocation, notably the large sewer main in Cambridge Street, to accommodate the project. The BWSC has noted that if any combined sewer is impacted by construction, a new storm drain must be installed to accommodate the stormwater runoff from the corresponding tributary area.

If the preferred construction technique will require the removal of landscape and streetscape improvements along the Cambridge Street corridor, the DEIR should commit to mitigation measures for repair or replacement in-kind (at a minimum) of disturbed areas. Mitigation measures should include timetables, etc., to ensure replacement in a timely fashion upon completion of stages of construction.

Several comment letters have indicated concerns about the numerous major transportation and infrastructure improvement projects slated for the Beacon Hill/West End/Back Bay region in the near future. These anticipated improvements include: reconstruction of the Storrow Drive Tunnel, major repairs to the Longfellow Bridge, redevelopment projects, and additional improvements associated with the CA/T project. I strongly encourage EOT to provide a characterization of how the proposed project and its construction period will be integrated into the larger scheme of nearby development and infrastructure projects. EOT should outline how the proposed construction phasing plan, traffic and pedestrian mitigation plans, and emergency vehicle access plans can be modified or altered if other nearby projects commence during a similar time period. EOT should describe in the DEIR how a coordinated approach can be implemented amongst the numerous major transportation projects proposed for the Beacon Hill/West End/Back Bay region.

At the MEPA EENF consultation session EOT indicated a willingness to establish a project advisory committee to allow for an ongoing forum of public input during the final design stage and during the construction period. This committee should be separate and unrelated to the MEPA review process and should be established and coordinated by EOT and local interest groups. EOT should outline the goals and a conceptual structure for this committee in the DEIR and commit to its implementation.

### Mitigation

The DEIR should include a separate chapter summarizing proposed mitigation measures. This chapter should also include draft Section 61 Findings for each state agency that will issue permits for the project. The draft Section 61 Findings should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.

Comments/Circulation

The DEIR should contain a copy of this Certificate and a copy of each comment letter received. The DEIR should respond fully to each substantive comment received to the extent that it is within MEPA jurisdiction. The DEIR should present additional technical analyses and/or narrative as necessary to respond to the concerns raised.

The proponent should circulate a hard copy of the DEIR to each state and city agency from which the proponent will seek permits or approvals and to each of the City agencies that submitted comments. The proponent should also circulate a copy of the DEIR to those submitting individual written comments and to any parties specified in section 11.16 of the MEPA regulations. To save paper and other resources, the proponent may circulate the DEIR in CD-ROM format, although the proponent should make available a reasonable number of hard copies, to accommodate those without convenient access to a computer to be distributed upon request on a first come, first served basis. The proponent should send a notice of availability of the DEIR (including relevant comment deadlines and appropriate addresses) to those who signed the petition and for which addresses are available. A copy of the DEIR should be made available for review at the Public Libraries located in: Boston, Revere, Chelsea, Winthrop, Cambridge and Somerville.

November 15, 2007

Date



Ian A. Bowles

## Comments received:

10/05/2007 Town of Winthrop, Office of the Town Manager  
 10/17/2007 P C Napier  
 10/29/2007 Boston Water and Sewer Commission  
 11/01/2007 City of Revere, Office of the Mayor  
 11/05/2007 Massachusetts Department of Environmental Protection – NERO  
 11/07/2007 Nilsson + Siden Associates, Inc.  
 11/07/2007 Conservation Law Foundation  
 11/07/2007 Historic New England  
 11/08/2007 Partners HealthCare System, Inc.  
 11/08/2007 Malek Al-Khatib  
 11/08/2007 Richard B. Mertens  
 11/08/2007 Massachusetts Water Resources Authority  
 11/08/2007 West End Civic Association  
 11/09/2007 Anthony Petruccelli, State Senator, First Suffolk and Middlesex  
 11/09/2007 Metropolitan Area Planning Council  
 11/13/2007 Beacon Hill Civic Association  
 11/13/2007 WalkBoston  
 11/13/2007 Boston Environment Department  
 11/13/2007 Downtown North Association  
 IAB/HSJ/hsj